

9/17/02

Mr. Jerry Pruzin
Midwest Pipe Coating, Inc.
925 Kennedy Avenue
Schererville, IN 46375

Re: 089-16022
First Administrative Amendment to
FESOP 089-14137-00096

Dear Mr. Pruzin:

Midwest Pipe Coating, Inc. was issued a FESOP on August 29, 2002, for a stationary metal pipe and bar abrasive cleaning and coating operation. A letter requesting certain changes was received on August 28, 2002. According to 326 IAC 2-8-10(a)(1) and (2), FESOP administrative amendments can be used to "correct typographical errors" and to identify "a change in a name, address, or telephone number of any person identified in the FESOP, or provide a similar minor administrative change at the source". Also, 326 IAC 2-8-10(a)(6) states that administrative amendments can be used for a revision in "descriptive information where the revision will not trigger a new applicable requirement or violate a permit term". The requested changes meet the requirements mentioned above, therefore, pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows (~~strikeout~~ to show deletions and **bold** to show additions):

(1) The responsible official name in Section A.1 is amended as follows:

Authorized individual: ~~Carl Laib~~, **Joel Chermak**, General Manager

(2) The facility description in Section A.2 is amended as follows. The emission units identified as EU-23 and EU-28 are both controlled by fabric filters, identified as CE5 and CE8, respectively. Therefore, the control equipment identified as CE6 and CE9 are not necessary and are no longer in use.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

...

- (d) One (1) I.D. Line Abrasive Cleaning Machine equipped with airwash separator and grit reclaim all identified as EU30 and rated at ~~4920~~ **100** pounds virgin grit per hour; particulate matter at the airwash separator controlled by a baghouse identified as CE10 and exhausting at one (1) stack identified as S/V20; and particulate matter at the reclaim controlled by a baghouse identified as CE11, constructed in 1985, and exhausting at one (1) stack identified as S/V21;

.....

- (g) One (1) Custom I Line Powder Spray Booth equipped with powder reclaim and an eighteen (18) gun electrostatic air atomized spray application system all identified as EU23, rated at 100 pounds virgin powder per hour; particulate matter at the spray booth controlled by dry filters identified as CE5, constructed in 1986, and exhausting at one (1) stack identified as S/V12; ~~particulate matter at the powder reclaim controlled by a baghouse identified as CE6 and exhausting at one (1) stack identified as S/V13;~~

- (h) One (1) Rebar Line Powder Spray Booth equipped with powder reclaim system and an

eighteen (18) gun electrostatic air atomized spray application system all identified as EU28 and rated at 250 pounds virgin powder per hour; particulate matter at the spray

booth controlled by dry filters identified as CE8, constructed in 1981, and exhausting at one (1) stack identified as S/V18; ~~and particulate matter at the powder reclaim controlled by a cartridge dust collector identified as CE9 and exhausting at one (1) stack identified as S/V19;~~

- (i) One (1) ~~Custom~~ **Dual** Coating Powder Spray Booth equipped with powder reclaim and a twenty four (24) gun electrostatic air atomized spray application system all identified as EU21, constructed in 1997, and rated at 750 pounds virgin powder per hour; particulate matter at the spray booth controlled by dry filters identified as CE14 and exhausting at one (1) stack identified as S/V7;

(3) Section A.3 is amended to remove item (ee) which refers to the same unit listed under (dd):

- (j) Machining where and aqueous cutting coolant continuously floods the machining interface.
.....
- (dd) Thin Film Line II Blowout Station used to remove residual steel abrasive from the inside of steel pipe **identified as EU15, with particulate matter controlled by a baghouse identified as CE3, and exhausting at one (1) stack identified as S/V4;**
- ~~(ee) One (1) Thin Film Line II Abrasive Grit Blow Out Station identified as EU15, with particulate matter controlled by a baghouse identified as CE3, and exhausting at one (1) stack identified as S/V4;~~
- ~~(ff-ee)~~ One (1) **Rear Rebar** Line Patch Station rated at 8 pounds patching compound per hour utilizing a brush application method and identified as EU40, exhausting at one (1) stack identified as S/V29; ~~and~~

(4) Section D.1 is amended as follows. The emission units identified as EU-23 and EU-28 are both controlled by fabric filters, identified as CE5 and CE8, respectively. These units are already included in Section D.2 of the permit. Therefore, items (e) and (i) are deleted.

SECTION D.1 FACILITY OPERATION CONDITIONS

- (c) One (1) ~~Rear Rebar~~ **Rebar** Line Abrasive Cleaning Machine equipped with storage hopper and airwash separators all identified as EU27 and rated at 80 pounds virgin grit per hour, with particulate matter controlled by cartridge dust collector identified as CE7, constructed in 2000, and exhausting at one (1) stack identified as S/V17;
- ~~(e) One (1) Custom I Line Powder Reclaim (EU 23) controlled by a baghouse identified as CE6 and exhausting at one (1) stack identified as S/V13;~~
- ~~(i) One (1) Rebar Line Powder Reclaim (EU 28) controlled by a cartridge dust collector identified as CE9 and exhausting at one (1) stack identified as S/V19;~~

(5) Section D.1.1 is amended to delete conditions related to EU-23 and EU-28.

Process/Facility	Exhaust Flow Rate (dscfm)	Allowable PM Emission Rate (lb/hr)
EU5 & EU14	6,623	1.70 each
EU27	6,817	1.75
EU30	5,649	1.45
EU30 (reclaim)	4,188	1.08

EU23 (reclaim)	4,188	1.08
EU28 (reclaim)	7,791	2.00

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(6) Condition D.1.2 is amended to delete conditions related to CE6, and CE9 which are no longer in use. Unit EU28 and CE-8 will be moved to Section D.2.

- (d) the PM-10 emissions from baghouse CE-11 controlling EU30 (reclaim), shall not exceed 3.25 pounds per hour, which is equivalent to 18.6 tons per year.
- ~~(e) the PM-10 emissions from baghouse CE-6 controlling EU23 (reclaim), shall not exceed 0.15 pounds per hour, which is equivalent to 0.64 tons per year.~~
- ~~(f) the PM-10 emissions from baghouse CE-8 controlling EU28, shall not exceed 0.29 pounds per hour, which is equivalent to 1.28 tons per year.~~
- ~~(g) the PM-10 emissions from dust collector CE-9 controlling EU28 (reclaim), shall not exceed 0.29 pounds per hour, which is equivalent to 1.28 tons per year.~~
- ~~(h e)~~ the PM-10 emissions from baghouse CE-3 controlling EU15, shall not exceed 0.15 pounds per hour, which is equivalent to 0.64 tons per year.

(7) Condition D.1.5 is amended. Emission units EU23 and EU28 are already included in Section D.2.

In order to comply with D.1.1 and D.1.2, the baghouses and dust collectors for PM and PM-10 control shall be in operation at all times when the EU5, EU14, EU23, EU27, EU28 and EU 30 are in operation.

(8) Condition D.1.6 is amended. Emission units EU23 and EU28 are already included in Section D.2.

D.1.6 Visible Emissions Notations

- (a) Once per shift visible emission notations of the EU5, EU14, ~~EU23~~, EU27, ~~EU28~~ and EU30 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(9) Condition D.1.10 is amended. Emission units EU23 and EU28, are already included in Section D.2 of the permit.

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain once per shift records of visible emission notations of the EU5, EU14, ~~EU23~~, EU27, ~~EU28~~ and EU30 stack exhausts.

(10) Condition D.2.5 is amended to add the PM-10 limit for CE-5 (which is being deleted from Section 1).

- (d) the PM-10 emissions from dry filters CE-5 controlling EU23, shall not exceed 0.15 pounds per hour, which is equivalent to 0.64 tons per year.
- (e) the PM-10 emissions from baghouse CE-8 controlling EU28, shall not exceed 0.29 pounds per hour, which is equivalent to 1.28 tons per year.**

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

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This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

mm

cc: File - Lake County
U.S. EPA, Region V
Lake County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels/Ramesh Tejuja
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) Renewal
OFFICE OF AIR QUALITY
and
IDEM NORTHWEST INDIANA OFFICE**

**Midwest Pipe Coating, Inc.
925 Kennedy Avenue
Schererville, IN 46375**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 089-14137-00096	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 29, 2002 Expiration Date: August 29, 2007

First Administrative Amendment No.: 089-16022	Pages Modified: 5, 6, 8, 9, 30, 31, 32, 33, 36
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and IDEM Northwest Indiana Office. The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary metal pipe and bar abrasive cleaning and coating operation.

Authorized individual:	Joel Chermak, General Manager
Source Address:	925 Kennedy Avenue, Schererville, IN 46375
Mailing Address:	925 Kennedy Avenue, Schererville, IN 46375
SIC Code:	3479
Source Location Status:	Lake
County Status:	Nonattainment for SO ₂ and Ozone Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, Emission Offset Rules

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) Thin Film Line I Abrasive Cleaning Machine equipped with storage hopper and airwash separators all identified as EU5 and rated at 40 pounds virgin grit per hour, with particulate matter controlled by a baghouse identified as CE13, constructed in 1966, and exhausting at one (1) stack identified as S/V9;
- (b) One (1) Thin Film Line II Abrasive Cleaning Machine equipped with storage hopper and airwash separators all identified as EU14 and rated at 200 pounds virgin grit per hour, with particulate matter controlled by a baghouse identified as CE1, constructed in 1978, and exhausting at one (1) stack identified as S/V1;
- (c) One (1) Rebar Line Abrasive Cleaning Machine equipped with storage hopper and airwash separators all identified as EU27 and rated at 80 pounds virgin grit per hour, with particulate matter controlled by cartridge dust collector identified as CE7, constructed in 2000, and exhausting at one (1) stack identified as S/V17;
- (d) One (1) I.D. Line Abrasive Cleaning Machine equipped with airwash separator and grit reclaim all identified as EU30 and rated at 100 pounds virgin grit per hour; particulate matter at the airwash separator controlled by a baghouse identified as CE10 and exhausting at one (1) stack identified as S/V20; and particulate matter at the reclaim controlled by a baghouse identified as CE11, constructed in 1985, and exhausting at one (1) stack identified as S/V21;

- (e) One (1) Thin Film Line I: One (1) Powder Spray Booth equipped with powder reclaim and a sixteen (16) gun electrostatic air atomized spray application system all identified as EU7 and rated at 110 pounds virgin powder per hour, with particulate matter controlled by dry filters identified as CE2, constructed in 1965, exhausting at one (1) stack identified as S/V3;
- (f) One (1) Thin Film Line II: One (1) Powder Spray Booth equipped with powder reclaim and a thirty-two (32)gun electrostatic air atomized spray application system, identified as EU19 and rated at 750 pounds virgin powder per hour, with particulate matter controlled by dry filters identified as CE4, constructed in 1984, and exhausting at one (1) stack identified as S/V6;
- (g) One (1) Custom I Line Powder Spray Booth equipped with powder reclaim and an eighteen (18) gun electrostatic air atomized spray application system all identified as EU23, rated at 100 pounds virgin powder per hour; particulate matter at the spray booth controlled by dry filters identified as CE5, constructed in 1986, and exhausting at one (1) stack identified as S/V12;
- (h) One (1) Rebar Line Powder Spray Booth equipped with powder reclaim system and an eighteen (18) gun electrostatic air atomized spray application system all identified as EU28 and rated at 250 pounds virgin powder per hour; particulate matter at the spray booth controlled by dry filters identified as CE8, constructed in 1981, and exhausting at one (1) stack identified as S/V18;
- (i) One (1) Custom Coating Powder Spray Booth equipped with powder reclaim and a twenty four (24) gun electrostatic air atomized spray application system all identified as EU21, constructed in 1997, and rated at 750 pounds virgin powder per hour; particulate matter at the spray booth controlled by dry filters identified as CE14 and exhausting at one (1) stack identified as S/V7;
- (j) One (1) Thin Film Line II: Three (3) natural gas direct fired process ovens, each rated at 12.8 million (MM) British thermal units (Btu) per hour each, identified as EU16, EU17 and EU18, each constructed in 1984, 1984, and 1988, respectively, and exhausting at one (1) stack identified as S/V5.
- (k) Three Liquid Coating Facilities:
 - (1) One (1) I.D. Line Paint Machine rated at 400 pounds liquid paint per hour utilizing a one (1) gun airless spray application system all identified as EU31, with particulate matter over spray controlled by dry filters identified as CE12, constructed in 1985, and exhausting at one (1) stack identified as S/V22;
 - (2) One (1) O.D. Paint Station rated at 400 pounds liquid paint per hour utilizing a flow coating or a one (1) gun airless spray application system, constructed in 1997, all identified as EU39, and exhausting at one (1) stack identified as S/V30;

- (3) One (1) Rebar Line Patch Station rated at 8 pounds patching compound per hour utilizing a brush application method, and identified as EU40, exhausting at one (1) stack identified as S/V29.

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- (1) Cutting 20,000 linear feet or less of one inch (1") plate or equivalent.
- (2) Using 80 tons or less of welding consumables.
- (o) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (q) Heat exchanger cleaning and repair.
- (r) Paved and unpaved roads and parking lots with public access.
- (s) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (t) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (u) Emergency gasoline generators not exceeding 110 horsepower.
- (v) Emergency diesel generators not exceeding 1600 horsepower.
- (w) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting ; pneumatic conveying; and woodworking operations.
- (x) Filter or coalescer media change out.
- (y) Thin Film Line I Ink Printer used to mark bar and pipe with identification information.
- (z) Thin Film Line II Ink Printer used to mark pipe with identification information.
- (aa) Pyrolysis cleaning furnace, identified as EU25, used to remove coating from steel parts by heating and vaporizing.
- (bb) Thin Film Line II Rinse Station spraying a water/phosphoric acid mixture onto steel pipe.
- (cc) Thin Film Line I Blowout Station used to remove residual steel abrasive from the inside of steel pipe.
- (dd) Thin Film Line II Blowout Station used to remove residual steel abrasive from the inside of

steel pipe identified as EU15, with particulate matter controlled by a baghouse identified as CE3, and exhausting at one (1) stack identified as S/V4;

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- (ee) One (1) Rebar Line Patch Station rated at 8 pounds patching compound per hour utilizing a brush application method and identified as EU40, exhausting at one (1) stack identified as S/V29;
- (ff) I.D. paint station applying a rust preventive coating onto pipe ends.
- (gg) Quality control lab located in the main office.
- (hh) Rebar fume hood exhausting fume at the exist side of the Rebar spray booth to the atmosphere.
- (ii) Thin Film Line fume hood exhausting fume at the exist side of the Thin Film Line spray booth to the atmosphere.
- (jj) Dowel bar dip tank coating steel bars with a corrosion preventive compound.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) Thin Film Line I Abrasive Cleaning Machine equipped with storage hopper and airwash separators all identified as EU5 and rated at 40 pounds virgin grit per hour, with particulate matter controlled by a baghouse identified as CE13, constructed in 1966, and exhausting at one (1) stack identified as S/V9;
- (b) One (1) Thin Film Line II Abrasive Cleaning Machine equipped with storage hopper and airwash separators all identified as EU14 and rated at 200 pounds virgin grit per hour, with particulate matter controlled by a baghouse identified as CE1, constructed in 1978, and exhausting at one (1) stack identified as S/V1;
- (c) One (1) Rebar Line Abrasive Cleaning Machine equipped with storage hopper and airwash separators all identified as EU27 and rated at 80 pounds virgin grit per hour, with particulate matter controlled by cartridge dust collector identified as CE7, constructed in 2000, and exhausting at one (1) stack identified as S/V17;
- (d) One (1) I.D. Line Abrasive Cleaning Machine equipped with airwash separator and grit reclaim all identified as EU30 and rated at 1920 pounds virgin grit per hour; particulate matter at the airwash separator controlled by a baghouse identified as CE10 and exhausting at one (1) stack identified as S/V20; and particulate matter at the reclaim controlled by a baghouse identified as CE11, constructed in 1985, and exhausting at one (1) stack identified as S/V21.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-1-2] [326 IAC 2-3]

Pursuant to 326 IAC 6-1-2 (Particulate Emission Limitations), the particulate matter emissions from the processes controlled by baghouses CE-1, CE-6, CE-7, CE-9 - CE-11 and CE-13 shall each be limited to 0.03 gr/ dscf. This is equivalent to particulate allowable emission rates of the following:

Process/Facility	Exhaust Flow Rate (dscfm)	Allowable PM Emission Rate (lb/hr)
EU5 & EU14	6,623	1.70 each
EU27	6,817	1.75
EU30	5,649	1.45
EU30 (reclaim)	4,188	1.08

Compliance with these limits shall make the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

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D.1.2 Particulate Matter Less Than Ten Microns (PM-10) [326 IAC 2-8-4] [326 IAC 2-3]

Pursuant to 326 IAC 2-8 (FESOP):

- (a) the PM-10 emissions from baghouse CE-15 and CE-1 controlling EU5 and EU14, respectively, shall each not exceed 2.35 pounds per hour, which is equivalent to 10.31 tons per year.
- (b) the PM-10 emissions from dust collector CE-7 controlling EU27, shall not exceed 0.73 pounds per hour, which is equivalent to 3.22 tons per year.
- (c) the PM-10 emissions from baghouse CE-10 controlling EU30, shall not exceed 3.25 pounds per hour, which is equivalent to 18.6 tons per year.
- (d) the PM-10 emissions from baghouse CE-11 controlling EU30 (reclaim), shall not exceed 3.25 pounds per hour, which is equivalent to 18.6 tons per year.
- (e) the PM-10 emissions from baghouse CE-3 controlling EU15, shall not exceed 0.15 pounds per hour, which is equivalent to 0.64 tons per year.

Compliance with these requirements shall limit the source wide potential to emit PM-10 to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-3 do not apply.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

During the period between July 2005 - December 2005, in order to demonstrate compliance with Conditions D.1.1 and D.1.2 the Permittee shall perform PM and PM-10 testing on the I.D. Line Abrasive Cleaning Machine equipped with airwash separator and grit reclaim, all identified as EU30, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.5 Particulate Matter (PM and PM-10)

In order to comply with D.1.1 and D.1.2, the baghouses and dust collectors for PM and PM-10 control shall be in operation at all times when the EU5, EU14, EU27 and EU 30 are in operation.

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D.1.6 Visible Emissions Notations

- (a) Once per shift visible emission notations of the EU5, EU14, EU27, and EU30 stack exhausts shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the differential pressure across the baghouse used in conjunction with EU5, EU14 and EU30, and the dust collector used in conjunction with EU27 at least once per shift when the units are in operation when venting to the atmosphere. When for any one reading, the pressure drop across baghouses and dust collectors is outside the normal ranges of 1.0 to 6.0 inches of water, or ranges established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge

and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and IDEM Northwest Indiana Office and shall be calibrated at least once every six (6) months.

D.1.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the abrasive cleaning operations and the powder spray booth operations. All defective bags shall be replaced.

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D.1.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain once per shift records of visible emission notations of the EU5, EU14, EU27 and EU30 stack exhausts.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain once per shift records of the differential pressure during normal operation when venting to the atmosphere.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain records of the

results of the inspections required under Condition D.1.8 and the dates the vents are redirected.

- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this Permit.

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- (b) the PM-10 emissions from dry filters CE-4 controlling EU19, shall not exceed 1.32 pounds per hour, which is equivalent to 5.8 tons per year.
- (c) the PM-10 emissions from dry filters CE-14 controlling EU21, shall not exceed 0.44 pounds per hour, which is equivalent to 1.93 tons per year.
- (d) the PM-10 emissions from dry filters CE-5 controlling EU23, shall not exceed 0.15 pounds per hour, which is equivalent to 0.64 tons per year.
- (e) the PM-10 emissions from baghouse CE-8 controlling EU28, shall not exceed 0.29 pounds per hour, which is equivalent to 1.28 tons per year.

Compliance with these requirements shall limit the source wide potential to emit PM-10 to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-3 do not apply.

D.2.6 Particulate Matter Overspray [326 IAC 6-1-11.1]

Pursuant to 326 IAC 6-1-11.1 (Fugitive Particulate Matter Emission Limits in Lake County), the particulate matter overspray from EU39 shall be limited to a zero percent frequency of visible emission observations from a building enclosing all or part of the coating operation, and 10 percent opacity when operating otherwise.

D.2.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.2.8 Particulate Matter (PM and PM-10)

In order to comply with D.2.4, D.2.5 and D.2.6, the dry filters for PM and PM-10 control shall be in

operation at all times when the spray booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S/V 22 and S/V 30 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.